Exhibit C

Declaration of Thomas M. Huff (April 27, 2020)

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:04-cr-385 (LMB)
	)	
ALI AL-TIMIMI,	)	
	)	
Defendant.	)	
	)	

DECLARATION OF THOMAS M. HUFF

Under 28 U.S.C. § 1746, I, Thomas M. Huff, state the following:

1.   I am a member of the bar of this Court and have served as co-counsel for the defendant, Dr. Ali Al-Timimi, in the above-captioned case since November of 2014.

2.   Dr. Al-Timimi and I are communicating by postal mail, and I anticipate that he will supplement today's emergency motion with a declaration that further describes his underlying medical conditions and current medications. On information and belief, I understand the following to be true:

a.   Dr. Al-Timimi has had asthma since the age of 5. His condition is currently treated with two prescription medications. The first is a corticosteroid inhaler (mometasone furoate), which he takes daily as a long-term controller medication. The second is an albuterol rescue inhaler, which he uses as needed. Last year, Dr. Al-Timimi became infected with a cold that worsened over time and required treatment with the oral steroid, prednisone. He also received a breathing treatment that combined oxygen with a nebulized medication.

b.   Al-Timimi also takes several daily medications for hypertension, including losartan potassium, daily aspirin, hydrochlorothiazide, and amlodipine.

c.   Last summer, Al-Timimi suffered from a dental abscess that presented with high fever, swelling, and extreme pain. His condition went untreated for over two weeks and required intervention from my co-counsel, Jonathan Turley, to secure appropriate medical care. I have attached a copy of Mr. Turley's letter to the Warden as Exhibit E to our memorandum.

I so declare, under penalty of perjury, that the foregoing is true and correct.

Executed on April 27, 2020   _____
                                                              Thomas M. Huff

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